

United States District Court

for the
Western District of New York

United States of America

v.

Case No. 22-mj-69

DUNIA MOHAMMED PIROT

Defendant

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

Count 1

On or about April 18, 2022, in the Western District of New York, Dunia Mohammed **PIROT** did forcibly and intentionally assault, resist, oppose, impede, intimidate, and interfere with a person designated in Title 18, United States Code, Section 1114 as an officer or employee of the United States while engaged in and on account of the performance of official duties, and such acts involved physical contact and bodily injury with the victim of that assault, in violation of Title 18, United States Code, Section 111(a)(1).

This Criminal Complaint is based on these facts:

☒ Continued on the attached sheet.

/s Curtis Middlebrooks

Complainant's signature

CURTIS R. MIDDLEBROOKS, JR.
SPECIAL AGENT
FEDERAL BUREAU OF INVESTIGATION

Printed name and title

Sworn to and signed telephonically.

Date: April 18, 2022

H Kenneth Schroeder, Jr

Judge's signature

City and State: Buffalo, New York

HONORABLE H. KENNETH SCHROEDER, JR.
UNITED STATES MAGISTRATE JUDGE

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

STATE OF NEW YORK)
COUNTY OF ERIE) SS:
CITY OF BUFFALO)

I, **CURTIS MIDDLEBROOKS**, having been first duly sworn, do hereby depose and state as follows:

1. I am a Special Agent of the Federal Bureau of Investigation (“FBI”) of the United States Department of Justice. As such, I am an “investigative or law enforcement officer of the United States” within the meaning of 18 U.S.C. § 2510(7), that is, an officer of the United States who is empowered by law to conduct investigations of and to make arrests for offenses enumerated in 18 U.S.C. § 2516.

2. Since November of 2021, I have been assigned to the Buffalo division where I am currently assigned to conduct criminal investigations assigned to the FBI's Safe Streets Violent Gang Task Force. During that time, I have participated in investigations involving drug trafficking, organized crime, and violent criminal matters.

3. This affidavit is being submitted for a limited purpose, that is, a probable cause determination. Therefore, I have not presented all of the facts of this investigation to date. I have set forth only the information I believe to be necessary to establish probable cause. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from law enforcement officers and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not

set forth all of my knowledge about this manner.

4. I make this affidavit in support of a criminal complaint charging Dunia Mohammed PIROT, (hereinafter “**PIROT**”) with forcibly and intentionally assaulting, resisting, opposing, impeding, intimidating, and interfering with a person designated in Title 18, United States Code, Section 1114 as an officer or employee of the United States while engaged in and on account of the performance of official duties and such acts involved physical contact and bodily injury with the victim of that assault in violation of Title 18, United States Code, Section 111(a)(1) that occurred on April 18, 2022 at the Lewiston Port of entry, in the Western District of New York. This affidavit is based upon my knowledge of the investigation and upon information that I received from other law enforcement officers, witnesses, and cooperating sources. Since this affidavit is offered for the limited purpose of securing a criminal complaint, it does not contain all the information obtained during the course of the investigation.

5. On or about April 18, 2022, at approximately 12:27 a.m., United States Customs and Border Protection (hereafter “CPB”) encountered, at the Lewiston Bridge port of entry, a Tennessee plated SUV (TN/BFR1044). The vehicle was driven by Diako JALAL and occupied by Dunia Mohammed **PIROT** and their minor children. A record check for JALAL revealed that **PIROT** had an active order of protection against JALAL. JALAL was removed from the vehicle and escorted to the secondary inspection area. **PIROT**, along with her children, were allowed to drive the vehicle to the secondary inspection area.

6. The Lewiston Police Department (LPD) was notified of JALAL’s violation of

the active stay away order and dispatched officers to the Lewiston Port of Entry.

7. While **PIROT** was in the secondary inspection waiting area, a CPB Officer was holding a door open in order to assist LPD with escorting JALAL to the police car.

8. While JALAL was being placed under arrest, **PIROT** attempted to push her way into the room where JALAL was being held. The CPB Officer attempted to calm **PIROT**, but she began to punch and kick him and then bit the CPB Officer on the hand, breaking the skin and causing him to bleed.

WHEREFORE, based on the foregoing, I respectfully submit that there is probable cause to believe that on or about April 18, 2022, in the Western District of New York, Dunia Mohammed **PIROT** did forcibly and intentionally assault, resist, oppose, impede, intimidate, and interfere with a person designated in Title 18, United States Code, Section 1114 as an officer or employee of the United States while engaged in and on account of the performance of official duties, and such acts involved physical contact and bodily injury with the victim of that assault, in violation of Title 18, United States Code, Section 111(a)(1).

/S Curtis Middlebrooks
CURTIS MIDDLEBROOKS
Special Agent
Federal Bureau of Investigation

Sworn and subscribed to me electronically
this ~~18th~~ day of April 2022.

H Kenneth Schroeder, Jr
HON. H. KENNETH SCHROEDER, JR.
United States Magistrate Judge